

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLAUDE F. REYNAUD, JR.
and CORDELL HAYMON

vs.

CERTAIN UNDERWRITERS OF
LLOYD'S OF LONDON

§
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§
§
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§

CIVIL ACTION NO.

3:14-CV-03731-N-BG

UNOPPOSED MOTION TO WITHDRAW

Pursuant to Local Rule 83.12, William D. Cobb, Jr. ("Cobb") and Carrie Johnson Phaneuf ("Phaneuf") and the firm of Cobb Martinez Woodward PLLC (together the "Firm"), file this Motion seeking entry of an Order allowing Cobb, Phaneuf and the Firm to withdraw as counsel for the Plaintiff, Claude F. Reynaud, Jr. In support of this Motion, the Court is advised:

1. The Firm has represented Mr. Reynaud since the inception of the captioned matter;
2. In November of this year, the firm of McKenna & Prescott, PLLC, 5801 E. 41st Street, Suite 501, Tulsa, Oklahoma, was also engaged to represent Mr. Reynaud;
3. McKenna & Prescott PLLC filed a Notice of Appearance in this matter on November 30, 2014 [DOC 15];
4. It is no longer necessary that Mr. Reynaud be represented by two (2) law firms and the McKenna & Prescott firm will continue to do so;
5. Mr. Reynaud is aware of and consents to this Motion and the discontinuance of further representation by this Firm in the captioned matter. This Firm's withdrawal from the case will not cause undue delay or prejudice to any party;

6. William D. Cobb, Jr., Carrie Johnson Phaneuf and Cobb Martinez Woodward PLLC, request that this Court enter an order removing Mr. Cobb, Ms. Phaneuf and Cobb Martinez Woodward PLLC, as counsel of record for the Plaintiff Claude F. Reynaud, Jr.

Respectfully submitted,

COBB MARTINEZ WOODWARD PLLC

By: /s/ Carrie Johnson Phaneuf
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AND

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**ATTORNEYS FOR PLAINTIFF CLAUDE F.
REYNAUD, JR.**

CERTIFICATE OF CONFERENCE

Counsel for the Plaintiff, Claude F. Reynaud, Jr., has conferred with counsel for all parties, via email at the email address(es) reflected on the Court's docket, on December 1, 2014. No party has responded in opposition to this Motion.

/s/ Carrie Johnson Phaneuf
Carrie Johnson Phaneuf

CERTIFICATE OF SERVICE

On December 3, 2014, I electronically submitted the foregoing document with the Clerk of the Court of the U.S. District Court, Northern District of Texas, using the electronic case filing (ECF) system of the Court. I hereby certify that I will serve all parties individually or through their counsel of record, electronically, or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Carrie Johnson Phaneuf
Carrie Johnson Phaneuf